



August 25, 2014

Chairman Tom Wheeler  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Comcast Corporation ("Comcast") and Time Warner Cable Inc. ("TWC") Transaction,  
MB Docket Number 14-57, Divestiture by Comcast of In Demand

Dear Chairman Wheeler,

Herring Networks Inc. ("Herring") is a national cable programming company. Herring currently owns and operates two national cable services namely AWE, a 24/7 lifestyle and entertainment company and One America News Network, a credible source for national and international news 24/7.

I write to you regarding the enhanced tendency for discriminatory and anticompetitive behavior by In Demand, LLC ("In Demand") post Comcast – TWC merger. In Demand has a long history of alleged anticompetitive behavior including no less than a combined four program access and carriage access complaints filed at the FCC by MVPDs and an independent, family owned national cable network, specifically Herring, all while a senior Comcast programming representative acted as the chairman of the board of directors for In Demand. Comcast, TWC, Cox Communications, and Bright House (via Time Warner Entertainment – Advanced Newhouse partnership) have historically had key programming staff members of these four leading cable companies oversee the board of directors of In Demand. The working relationship of these four leading cable companies to guide the efforts of In Demand leads to the natural tendency to serve their own best interests, arguably, at times, at the detriment of non In Demand affiliated MVPDs, independent programmers and programming services, and the public interest. Herring urges a thorough examination of In Demand, its management and board, and impact to other MVPDs, independent programming services, and the public post a Comcast – TWC merger.

***HERRING NETWORKS, INC.***

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To minimize the concern of anticompetitive behavior and protect the public interest, Herring Networks, Inc. strongly recommends that you require Comcast to meet the following conditions for approval of its merger with TWC:

1. Comcast shall divest of its ownership interest in In Demand upon closure of the merger.
2. Comcast employees shall withdrawal from any board and management positions and any and all other positions held with In Demand.

As FCC Chairman, your leadership on this issue is critical to avoiding potential anticompetitive behavior by Comcast negatively impacting other MVPDs unaffiliated with In Demand, independent programming entities such as Herring, and the public.

I welcome the opportunity to further discuss this critical issue with you, your staff, and other offices at the FCC.

Sincerely,

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President  
Herring Networks, Inc.  
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